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IN THE

Supreme Court of the United States

OCTOBER TERM, A. D. 1952.

No. 483

EUSEBIUS JAMES BIGGS,

Petitioner,

vs.

MICHAEL FEINBERG, GROVER C. NIEMEYER, and JOHN TUOHY, as individuals and as representative of all the members of the Chicago Bar Association and the Chicago Bar Association as a body,

Respondents.

MOTION TO STRIKE THE RESPONDENTS' BRIEF or in the alternate REPLY BRIEF OF PETITIONER.

EUSEBIUS JAMES BIGGS,
8536 S. Peoria Street,
Chicago, Illinois,
Petitioner, Pro se.

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Supreme Court of the United States

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Respondents.

MOTION TO STRIKE THE RESPONDENTS' BRIEF or in the alternate REPLY BRIEF OF PETITIONER.

To the Honorable Justices of this Court,
MAY IT PLEASE THE COURT;

The Petitioner, Eusebius James Biggs, moves this court to strike Brief of the Respondents, because it seeks to obtain a ruling based on scandalous and impertinent matter not of record in any Court, and in suuport of this motion he sets forth hereinafter, his reply Brief which is to be considered as the suggestions in support of this motion.

S/ Eusebius James Biggs.
Petitioner.

REPLY BRIEF OF THE PETITIONER, or in the alternate AFFIDAVIT AND SUGGESTIONS TO STRIKE THE RESPONDENTS' BRIEF.

The petitioner Eusebius James Biggs respectfully shows the following;

The respondents' Brief is both scandalous and impertinent containing subject matter that can not be legally written, and is an attempt to influence the court by a personal attack on the petitioner, in which they rely chiefly, on the decisions of *Biggs* v. *Schwalge,* 341 Ill. App. 268, and *Biggs* v. *Plebanek,* 343 Ill. App. 466, which are in conflict with *Biggs* v. *Spader,* 411 Ill. 42, which is within the knowledge of all the counsel and the respondents themselves.

THE ISSUES.

The issues propounded by the respondents are without merit, and are set forth properly on pages 3 to 9 inclusive of petitioner's Brief. The issues as re-written by the respondents attempt to perpetrate a fraud on this court which will support this petitioner's contentions that it should be stricken.

I.

There is no precedent for the dismissal of the appeal, as no one can be practicing law in Illinois when he sues on an assignment, irrespective of any court's decision.

In Illinois, under the Uniform Sales Act, act of June 29, 1915, Smith Hurd Statutes of Illinois, chapter 121½, section 221 provides in part as follows;

"Every assignment shall be deemed and to be held fully perfected at the time such assignment shall be made."

Under Chapter 13, Smith Hurd Statutes of Illinois, anyone can sue and defend, to protect his own property or interests in his own person. (Pt. Br. 3)

This contention of the Petitioner is supported by the ruling of Illinois Supreme Court, in *Biggs* v. *Spader,* 411 Ill. 42, which reads in part as follows;

"This action had its beginning in the Superior Court of Cook County, when Eusebius J. Biggs, individually and as the assignee of the E. J. Biggs Construction Co., a corporation filed an action—Biggs who is a general contractor, appears *pro se* in this Court as he did in the lower court—Plaintiff (Biggs) has the right to appear pro se.

The respondents admit that the petitioner appeared *pro se,* before a division of the Appellate on page 6 of their Brief, which was unnecessary, as they had admitted the same thing with the motion to strike, but the remainder of that paragraph on page 6 can not be used in this court legally, and the statement is utterly false and untrue, which information is part of the report of proceedings at the Chicago Bar Association (complaint Pt. Br. page 7 and 8)

All the amounts sued for in the court were assigned to this petitioner for wages due or money advanced (pet. br. 3) but they did not arrive in possession of the petitioner, only as the debt to him was not paid, and in the case mentioned by the respondents on page 6, that case was being tried before a Municipal court judge by an incompetent attorney, who would not follow written instructions, and was lost insofar as the lower court was concerned, before this petitioner accepted the assignment.

Nowhere in any any allegation does this petitioner say he is a plumber, altho all the arguments before this court by the respondents say he is a plumber, and as the whole defense here is that the petitioner was practicing law, and wants to practice law, based on matters not before the court the Respondents' Brief is impertinent, and while this plaintiff could give citations on this and other points, he does not feel, that he should use them before a court whose knowledge of the law exceeds that of his own. In Cook County, Illinois, it is quite different.

II.

The practice of law is not an issue here, it is the right of a layman litigant to use the courts on equal terms with attorneys, which makes the issue in part.

The petitioner does say that the right to sue and defend is secondary to his right to earn a living, and when on page 9, the respondents quote part of the opinion of *Biggs* v. *Schwalge,* that part shows on its face that it should not appear in any printed opinion, and if the full sentence in the Petitioner's Brief had been written into the opinion, that particular sentence would not appear.

Among the many things that the petitioner likes to do, is to drive an automobile, and he owns three of them, however in driving the automobile that does not make him in violation of the chauffeurs laws, until such time as he drives for hire, and if he only possessed the tools for the automobile, his chances of violating the chauffeurs laws would be even more remote. This is parallel to practicing law because you study law.

The petitioner loves to fish and hunt, and he owns fishing tackle accumulated all over the United States over a period of 38 years, and six guns, one purchased in 1912, but that does not make him in violation of the laws gov-

erning the sale of fish or the fruits of the hunt. He must violate some law and be tried. before conviction. There must be a process and hearing of some kind in a court having jurisdiction for the purpose, which no one ever had when he was convicted twice of practicing law, as the opinions *Biggs* v. *Schwalge* (341 Ill. App. 268), and *Biggs* v. *Plebanek* (343 Ill. App. 466) state.

He is before this court because there was not a process or hearing, and he was tried and convicted as a matter of public record, in books sent world wide, of violating the Attorneys and Counsellor Act of Illinois on two occasions, and of violating the Chicago Plumbing Code, and the two published reports of his convictions were based on the findings of the Appellate court, contrary to the rulings of the lower court, who said the assignment was good, and as set forth in I of this Brief, the lower court had no choice, the Illinois statute says the assignment was perfected when it was signed, he did not have to prove that it was not legal it was incumbent upon others to at least allege it was illegal somewhere in some court, which was not done. The justices of course could not allege anything legally.

This is an unusual case, and while the respondents stress that he asks for certain specific relief, he has asked for other just relief, and the jurors will give that relief, if he is heard, and there are many avenues open.

This court has held consistently, that when a litigant is not heard; and in this case there was no attempt to hear because the subject matter was not before the court (Pt. Br. 4, 5, and 6); that is a violation of the 14th amendment. The question here is, if the statutes say an assignment is and has to be held perfected when it was signed, where is the authority to rule otherwise vested in any defendant, in the case of any court.

The allegations of the petitioner are not only plausible but have been admitted, and the primary question in this cause is the right of the petitioner to have an orderly hearing in the courts which he never received, and while it is conceded that an erroneous decision, just like the failure of a contractor to complete one contract after receiving a down payment, is not a crime, but 10 similar cases would be when there are 40 violations of the 14th amendment by the respondents here, one of the latest being committed by the Chief Justice of the Circuit Court of Cook County in December of 1952, and having no connection with the subject matter of the case, can he get relief from the Federal Court, as requested in his prayer of his complaint.

To illustrate what this petitioner has in mind is that this prominent member of the Chicago Bar Association and a past States attorney, had his bailiff call the petitioner into the rooms adjoining his chambers, and arriving there, petitioner was asked by this Chief Justice, if he was carrying a pistol and was informed to the contrary and then this Justice had two men search this petitioner. There was no gun, but there was a fair chance that he might have one, as he is a special deputy sheriff of Cook County, Ill. and has had a permit to carry a gun in Indiana since 1936, and his instructions from the Sheriff in Indiana is that the day he leaves the gun in the car so that it can be stolen; as it was twice in Illinois; the permit to carry the gun will be cancelled, and so when he drives into Indiana which sometimes happens daily he must put the gun in his pocket, but if he forgot to take it out when he reached the Illinois State line coming back, he is immediately subject to arrest, and acting on that premise the plumbers union have arranged to see that city and park policemen stop him to see if he has the

gun, and the park policemen once put the gun in different pockets when it was on the seat after he was arrested for supposedly running a stop light. The petitioner was acquitted of both charges but his guns were never returned, as another Judge refused to order the return.

The question here is, does the petitioner, go into court to answer to a motion to be searched under the orders of the Chief Justice, or to be subjected to other violations of the 14th amendment, and can the Federal Court stop the conspiracy to deprive this petitioner of his property without due process of law.

The case of *Biggs* v. *Schwalge,* 341 Ill. 268; speaking figuratively; is deader than any smoked herring and it is such common knowledge, that in the week of December 1, 1952, while a loaded 38 police special revolver was pointed at this petitioner's stomach by an auditor, who audits for the police captains, politicians, judges, etc., that go to make up the alliance of crime and politics that keeps the plumbing laws in force, said, "You beat Ulysses Schwartz, on the right to appear in Court, but it won't do you any good, because they will keep on throwing you out of court with decisions that will be impossible to appeal and the other items they know how to do." Asked where he got the information, he said he read the newspapers, but he called the police captain knowing that telephone number, and this happened because after he lied to a process server who had instructions to call this petitioner if the man in charge said he was not the man subpoenaed. The petitioner identified him by walking thru an unlocked gate, and looking in an open door, and asking the process server, if that was the man who said he was not George Hames, and when he replied "Yes" he was told to leave it on the desk, neither the process server or the petitioner went into his office, at which time

this Hames pulled his pistol and said he had been instructed to hold the process server and this petitioner in his office by his attorney if that subpoena was served. He still has it and on advice of counsel decided the process server and the petitioner were not trespassing in a public place of business.

Nobody including the Chief Justice or the States Attorney is interested about the matter, when anyone with any legal knowledge knows the man is in contempt of Court, so in order to intimidate this petitioner the Chief Justice had him searched. Fortunately, having been thru this before, (being illegally arrested and searched), there are two witnesses in the employ of this petitioner to the pointing of the gun, and four witnesses plus a report of proceedings which will prove he was searched because this petitioner put the latter item in the record, but if it goes to the Illinois Supreme Court, if the Chief Justice is so inclined all that is necessary is to mark the report of proceedings inaccurate and incomplete, and according to our Supreme Court then, this petitioner in his wrath and spleen attacks the judge: altho at all times he is telling the truth about intentional violators of the 14th amendment (Pt. Br. page 8)

III.

There is a diversity of citizenship, and a Federal ground does exist.

It is the theme of the respondent's brief that they can at all times ride two horses going in opposite directions, and their point III on this item is one of them. They seek to absolve the corporation in one place, while saying the individuals are the parties in the next place, but altho they live in other states they are not essential parties, and the actual facts can be stated by setting up something in a more concrete form than a pleading could ever do.

If the illegal acts of the Chicago Bar association are simulated to resemble a steam roller, the situation then develops like this;

A steam roller driven by an individual is engaged in illegal activities, to the detriment of this petitioner, they are a unit engaged in practices repugnant to the constitution of the United States (Pt. Br. 3 to 9 inc.) and if the individual is sued he says I do not own the steam roller, and if the corporation is sued they said the individual owns the steam roller, and so it is necessary that the Chicago Bar Association be sued as a body, in two capacities, and as there are many members of that Association living in the surrounding states, if a jury were to find that certain individuals living in those states were the persons directing the conspiracy against this petitioner, his money judgment, if it were obtained would not be collected nor could the judgment stand against individuals in the other states who live in them, and practice in Illinois.

This Court has consistently held that the allegations of jurisdictions is controlling, not what a defendant would like it to appear to be.

Further detail will be set forth im IV.

IV.

There is no frivolity in this cause, by the Petitioner, but there is much deceit and dishonesty in the Respondents' brief.

The respondents have heretofore commented that the Court of Appeals decision was right: and that in this point IV, there is a threat of action against the two Judges of the court of appeals for the Seventh Circuit, and this petitioner does not hesitate to say, that there

is no threat, and that the court of appeals was wrong in its decisions now, it was wrong in every dicision in which he ever had to deal with Judge Koerner, in particular as to the case of *Biggs* v. *Schwartz* No. 10474 in the United States Court of Appeals for the Seventh Circuit as both of these Judges ruled that suing on an assignment was practicing law in Illinois, which is without merit for the reasons set forth heretofore.

Since 1935, when the now deceased Justice Koerner, was Attorney general of Illinois, the journeymen plumbers, who control the master plumber have perpetuated a monopoly in Illinois, and they are doing it as of today, altho he and every judge, justice or attorney, with average intelligence who has studied the Illinois Plumbing License Laws of 1935 and 1951, and the Chicago plumbing code, which is written word for word in part as to licensing, as it has to be by the State statute; knows the laws are unconstitutional, and as of December 17, 1952, Judge Crow of the lower part of the State has so ruled, but as they have always done, the Attorney General of this State, including Justice Koerner prior to 1938, and the Corporation Counsel of Chicago, continuously obtain favors from the local courts to estop this petitioner from getting either plumbing permits or a license. It has been going on for eighteen years, (Pet. Br. 14 and 15)

Within the past three weeks, this petitioner has appeared before Judge Campbell, and Justice Touhy, seeking injunctive relief, based on the fact that as he has alleged in pleadings before them that the Plumbing License Laws are violations of the 14th amendment; on actions which can be revived by petition or motion; and the net result was that Justice Touhy and his associates, said an action to obtain permits by injunction could not be prosecuted unless the petitioner could show that at one

time he held a license under the laws that were unconstitutional the day they were written, and when this petitioner asked leave to file that decision of the Judge stating that the law was unconstitutional which is backed up by the opinion in *People* v. *Brown* (407 Ill. 565) stating a monopoly exists, that right was denied him by Justice Touhy and his two associates.

Before Judge Campbell, he was allowed to file his petition which was denied without the judge looking at it. There are times when it was shorter, as the clerk has called the case and before the court be addressed by this petitioner the court said, "denied," and in a previous opinion, Judge Campbell without trial ruled that, there was no interstate commerce involved, and the State law had to be constitutional, and this court has always held that no single judge could rule on the constitutionality of a state statute and if he did, his ruling could not be appealed but he must be mandamussed to reverse that decision, and the State Supreme Court denied the petition was right and Judge Campbell was wrong when they decided the case of *People* v. *Brown*.

The amount of $1,000,000.00 is supposed to make this case frivolous, but they have admitted the sum was due this petitioner and he has lost his right to sue for it, and while this brief is being written the petitioner is losing the earnings of some 50 to 60 employees, that he does not have, and those projected losses reach approximately $700.00 per working day, from which can be deducted that amount which he can earn from an average of about 5 employees, whom he uses to just keep the skeleton force alive until such time as he can get a master plumber's license or permits without the license.

It is to be noted that the respondents herein stress that he is a plumber, which is erroneous, he is a general contractor who has to control a plumbing company as the master plumbers in this area are afraid to work for him. At times he can get a bid on plumbing work and can tie the plumbing contractor up, and then the plumbing contractor is in hot water with the union and the master plumbers, and so the job drags, and he won't take another one, and this petitioner had to acquire a knowledge of the law, as he could not earn enough to pay his counsel. Hence he has to know law, but not practice law, to stop the illegal activities of the Judges sponsors. (Pt. Br. 12)

The constitution of Illinois, Article II section 19, provides as follows;

> "There ought to be a law, where the citizens secure Justice speedily and without cost * * *"

and as alleged in paragraph 7 which is admitted, Justice Touhy accepted a motion in April of 1952 when the City of Chicago was operating Chapter 192 of the municipal code of Chicago, which is the City plumbers clause law, when the corporation counsel of Chicago, had informed the Illinois Supreme Court in briefs that the State of Illinois has the only licensing power, and his subordinate argued it that way, and had Justice Touhy and his subordinates acted on the motion which included a petition for temporary injunction an appeal would have been attempted in the Illinois Supreme Court, and so Justice Touhy would not act, in violation of the State Constitution, until the City of Chicago amended the stated chapter of the ordinances which would prohibit the appeal. These are matters of court record, they are indisputable, and will upset the statement that, "Hisallegations (Biggs) are implausible. They do not have the appearance of truth

or credibility and are not likely of belief." (Res. Bf. 8 & 9.) "Biggs assertions are not worthy of belief and are of course frivolous" (Res. Bf. 9.)

V.

The Respondents' brief is an attempted fraud on this court, the subject matter in part cannot be legally in it, and the contents prove beyond a reasonable doubt that this petitioner's claims of the moral degeneracy of the lawyers in this area are well founded, and the petitioner's brief should be accepted as being true.

This court in deciding this point, should consider the previous matters set forth in the point I to IV inclusive, and in particular it should note that the issues as the respondents wrote them, are not the issues they have admitted, when they made their motion to strike.

Having indulged illegally in a personal attack on this petitioner, the petitioner in defense informs this court he is 56 years old, was raised by a Christian mother who knew no religious creed, which resulted in his being a member of a Congregational church in Chicago, and a member of the Baptist church in Bremerton, Washington, he has been married to Mrs. Biggs for 33 years, and Mrs. Biggs, his daughter, and his son in law are staunch Catholics, and he is proud of the fact that at the age of 2 and 5 his granddaughters, who were adopted from convents in Ireland, prefer to sit on his lap rather than the other members of his family.

The basic reason for a child to love one person more than another can not be determined but it could be that having been taught never to lie; as men acquire their vices: wine, women, dope, use of tobacco, deceit and no respect for others property; because in their teens they believe that makes them a man; and they can not be ac-

quired without lying to their mothers, either by word or act; this petitioner never acquired any vices other than a hatred for the deceit and dishonesty which is so apparent in the respondents' brief.

Going back to the case, handled by incompetent counsel, which came into the brief solely because the respondents wrote, "On pages 11-12 the petition herein, the petitioner refers to another action,"—and then they start the untruths, which have been stated in part heretofore, but as the truth should always be told, and telling the truth will hurt no one only insofar as he ought to be hurt, the actual facts in the case which is supposed to be proper, as these respondents say, is stated in the following paragraph.

The case was started by Pipe Trades, Inc., by an attorney who does not have to be named. As stated previously he would not follow written instructions, and as most lawyers do, he neglected his case, and on two occasions it was dismissed for want of prosecution, at a time when motions to strike were pending, none of which alleged lack of jurisdiction. In Illinois there is a two year limit on lien actions, as to filing against proper parties and opposing counsel was working to the end that limit be reached, and when it had been reached he insisted on the argument on a motion, of lack of jurisdiction, which was the first time this petitioner knew that the case had not been properly handled as he had not followed the corporation case. When it was in a condition that the only way it could be salvaged, would be to insist that the opposing counsel had waived the jurisdictional provisions, counsel for the corporation having secured re-instatement on two occasions, did not want to make that issue against a fellow attorney (there is too much of this type of trading in Cook County between counsel) and this petitioner accepted

his first choice in action for money owed him, as anything the corporations have in the matter of assets are his first chose in action for monye owed him, as anytioning. The petitioner has no license as a plumber, is not a plumber, but he is a general contractor, an engineer, and he is a master plumber in Indiana with a license, and he is a master plumber in Illinois without a license, and has been since 1932, during which period he has always been a general contractor operating under the name of the Biggs Construction Co., which name is properly registered in Illinois, and it is copyrighted in Illinois, and he also ran the E. J. Biggs Construction Co., a corporation, and both construction companies use his licenses, owned by him as an individual, to operate (pt. bf. 2 and 3). When the lower court decided in favor of the defendant dismissing the case without trial for lack of jurisdiction, and the case went before the respondents, the counsel immediately raised the decision of *Biggs* v. *Schwalge*, (341 Ill. App. 268) and as the case could be decided on the simple legal question of lack of jurisdiction, motion was made by this petitioner to dispense with abstracts, and the court (the respondents) insisted upon abstracts, thus qualifying this petitioner's right to appear before the respondents on an assignment of a chose in action, on which he personally had not done any actual work and which did not require his licenses. When the case came up before the respondents for argument this petitioner brought a court reporter along, and he was well prepared with justifiable criticism of the respondents, which made their faces very red, as it was being delivered, and when the court objected, this petitioner pointed out that the defendant's counsel had raised the case of *Biggs* v. *Schwalge*, and at a hint of the respondents herein in part, the opposing counsel asked that the reference to the case

of *Biggs* v. *Schwalge* be stricken from the records and the court immediately granted his request. The respondents herein, in writing their opinion stressed the point that all they passed on was the jurisdiction, and then the petitioner requested the cost of printing the abstract and Brief necessary to offset the opposing counsel's mention of the case of *Biggs* v. *Schwalge,* which they denied, and then allowed the opposing counsel $10.00 for costs of additional abstract. The opinion and the court records do not show that the case of *Biggs* v. *Schwalge* was stricken at the request of the opposing counsel, and on motion the respondents refused to make an order, or correct the opinion to show what happened as they want anyone who so desires to use it, (complt 11, pet bf 6 & 7) and they themselves are illegally using it here.

The respondents and their counsel are fraudulently raising the practice of law which does not and never did exist, which they all know, and what they are doing is following the theory espoused in error that caused a great war, that if you tell an untruth often enough it becomes a fact, but until the State of Illinois nullifies its statutes, no judge, no justice and no court can make suing on an assignment the practice of law legally, but as they do it illegally, this petitioner needs injunctive relief.

The respondents and their counsel are very abusive, and say, that the petitioner should understand that he abuses the processes of law (re. bf page 11) but that is not the case, as the retiring attorney general of the State of Illinois said in the week of January 6th, 1953, "The Circuit and Superior Courts do not give Justice but dispense injustice to those persons who are not affiliated with political law firms." His actual quotation was that lawyers were clever and managed to get their cases before a friendly judge to the detriment of the public and something has to

be done about it. This item was printed covering parts of two columns, in a large Chicago newspaper, at the time the respondents were telling this court in the writing of their brief that this petitioner can not be believed, when the corruption of our courts is public knowledge.

As ex Governor Green has said, "It no longer matters in Illinois, who has the law on his side but which lawyer he employs." The condition is intolerable, but any lawyer who would raise his voice against the corrupt courts, would incur the wrath of a large number of the sitting judges in Cook County, and no lawyer can stay in the legal profession and carry every case he brings into court up to this court, as this petitioner is doing at all times now.

Our Judges in too many instances are morally bankrupt and the most of them are members of the Chicago Bar Association and there is no doubt in anyone's mind who has discussed this matter with this petitioner, other than the respondents or their counsel, some of whom admit there is state action involved here, that if this court will grant the petition for writ of certiorari here things will immediately progress for the better in all those courts which are politically controlled in Chicago.

At the present time, pending before the respondent Touhy, with other respondents herein, is the case of *Biggs* v. *Schiller*. Schiller is sitting on the bench in the Municipal court of Chicago. The omission of the word Judge is intentional. With a court reporter present he has said, "I will not listen to you, I listen only to attorneys, only attorneys can argue law matters in my court." An appeal from his wrongful decision can not be made as it can not be perfected without action on motions, but he won't act. A petition for writ of mandamus was filed, and the Chief

Justice of the Superior Court of Cook County, and the Judges' Counsel paid for by the City of Chicago sat in the Judges' chambers and the motion to strike and dismiss the petition for writ of mandamus was allowed because counsel informed the court that Schiller would permit this petitioner to complete the matters essential for an appeal. There can be no doubt that a refusal to listen is an intentional violation of the 14th amendment.

The Chief Justice promised this petitioner that if Schiller would not behave as he should, he would call him into chambers and handle it that way. So the petitioner appeared as heretofore set forth and was told he could not argue in the court, and he then called on the Chief Justice who said, "If he won't, I can not make him," and so the second petition for writ of mandamus was filed and the counsel, who is on the committee of character and fitness for the Illinois Supreme Court confused the two cases, filed his motion to strike in the wrong case and was in default.

Thereupon, the Chief Justice of the Superior Court, allowed the record to be changed showing the motion as being filed in the right case, and within time, and then dismissed the petition for writ of mandamus, as a final order, with prejudice, and no appeal can be made in the the original case until the respondent Tuohy writes his opinion, and in the meantime the assets of the defendant are being squandered daily, and if, as, and when a judgment is finally secured, it is questionable if there will be anything that can be levied upon.

The brief of the defendant in that case prepared and filed by the counsel who is a member of the committee on character and fitness of the Illinois Supreme Court, says that this petitioner alleges he filed a suit under the name

of Pipe Trades, Inc. and then continues on as these respondents do, with untrue material that is not in any court record, indulging in a mild form of character assassination, and he says that the petitioner must have done something to Schiller to make him act like he did, and the answer is that this petitioner did not do anything to Schiller and argued law matters before him years ago, but that was before he started to go to the Courts of Appeals to break up the plumbing racket, which pay the respondents' sponsors, and the racketeers the sum of $10,000,000.00 per year, because they maintain a monopoly by illegal legislation because the courts and the corporation counsel do not uphold the laws and constitution of the United States as they have sworn on oath to do, and some of that ten million dollars comes from every taxpayer in the United States, as the monopoly is not only operated on Federal work in and around Chicago, only those chief sponsors of the monopoly are allowed to bid on the work, or could bid on the work because the union assigns the men and this petitioner can not get any employees from the union altho he employs all union men except the laborers which he obtains from the State employment offices.

There is nothing frivolous about the petitioner's brief, in this cause, but there is an attempt to sway the opinion of this court, by the use of untrue statements of the respondents' counsel and as the word "estop" in law means to prohibit, prevent and similar items, the attempt to ridicule this petitioner because of their own ignorance, while they were successful with these suggestions in the Circuit Court of Appeals; the brief should be stricken here and made a matter of record, and then the Board of Managers of the Chicago Bar Association instead of letting their offices be used for illegal purposes (pt. bf 7, 8 & 9) might act like the decent and law abiding citizens

they are supposed to be, which will put an end to socalled fixed cases in Illinois Courts, where intelligent attornies stand with tears in their eyes, caused by frustration and rage, because their efforts in behalf of their clients came to naught because counsel with the political connections, like some of those responsible for this brief, do not have to know any law, nor the definition of simple words, but they do know the Judges.

This court should stop what is going on in Cook County, and if the respondents' brief is stricken, that alone will tend to stop it, and if this court will issue the writ of certiorari, to stop the intentional violations of the 14th amendment to the Constitution of the United States, many men will say "Thank God" for the Supreme Court of the United States. It might be added in closing that when this petitioner said, "That it was unfortunate that he was raised in a Christian Doctrine that teaches that we are our Brother's keeper," the corporation counsel of Chicago, said the petitioner was in contempt of court for raising a religious issue, in his brief to the Illinois Supreme Court, and while it seems fantastic and implausable, the record shows that this petitioner was held in contempt of court and his Brief stricken, on that motion, which was probably denied by one Justice, who served himself and not his county.

/s/ Eusebius James Biggs,
Petitioner.

COUNTY OF COOK,
STATE OF ILLINOIS, } ss.

Eusebius James Biggs, being duly sworn on oath, deposes and says he wrote the foregoing subject matter by him subscribed, that he has a full knowledge of the facts set forth therein and they are true in substance and in fact.

/s/ Eusebius James Biggs.

Subscribed and sworn to before me this 16th day of January A. D. 1953.

/s/ Hector Scheffer,
Notary Public.

My commission expires on .....